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January 10, 2025

BY ECF

Honorable Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Adam White v. The City of New York, et al., 23 CV 6924 (RER)(MMH)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and represent defendants City of New York, New York City Police Department, and the defendant police officers (collectively, "City defendants") in the above-referenced matter.

As per the Court's Order of December 4, 2024, the parties respectfully submit this joint status report regarding the status of settlement. See ECF Minute Entry, December 4, 2024. Plaintiff has accepted the City defendants' Rule 68 Offer of Judgment, and plaintiff and City defendants are now trying to settle attorney's fees and costs. Plaintiff will be filing the appropriate paperwork confirming that he has accepted the City defendants' Rule 68 Offer of Judgment on the docket in the near future.

Plaintiff and defendant Klein will continue their settlement discussions, and request that the date by which they must submit a proposed discovery schedule be extended from January 17, 2025 to February 21, 2025 if they do not settle.

Thank you for your consideration herein.

Respectfully submitted,

Joseph M. Hiraoka, Jr.

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Senior Counsel

Special Federal Litigation Division

cc: All Counsel (via ECF)